-- REMARKS --

Claims 1-36 remain under consideration, and claim 37 has been cancelled, and its subject matter incorporated into independent claims 1, 19, and 35.

A. Claims 1-5, and 7-37 were rejected as unpatentable over Barber, United States Patent 4,858,121 in view of Rozen, United States Patent 6,073,106.

The rejection of claims 1-5, and 7-37 as unpatentable under 35 U.S.C §103(a) over Barber in view of Rozen is traversed. To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See, MPEP §2143.

At a minimum, the references do not teach or suggest "authenticating the request with a third party certificate authority," as claimed in claims 1, 19 and 35. The Examiner alleges such a teaching within Rozen, and correctly does not rely on Barber for such teaching.

However, Rozen fails to make any such teaching. Rozen teaches a method of managing and controlling access to personal information. The Examiner erroneously cites to column 4, lines 33-65. However, rather than teaching or suggesting authenticating the request with a third party certificate authority, as claimed, Rozen simply teaches that a service provider can control access to personal information. No third party authentication is taught or suggested.

In addition, Barber fails to teach or suggest providing patient medical financial information through a networked connection outside of the medical providers office, as noted by the Examiner, inter alia, on p. 3 of the office action ("since it appears that Barber et al. is more directed to verifying the physician, patient and insurance company identifications."). In fact, Barber specifically teaches "plurality of physician terminals, which are located in physicians' offices, are interconnected." See, column 1, lines 63-64. Those of ordinary skill in the art would not be motivated to use a third party authentication process if all of the terminals are within physicians' offices, and the Examiner proffers no evidence of any such motivation – certainly Rozen does not provide any such teaching or motivation.

Furthermore, there can be no motivation to combine these references in light of Barber's failure to proclaim its medical payment system as anything less than ideal and Rozen's failure to proclaim its method of managing and controlling access to personal information as ideal.

Furthermore, claims 2-5, 9-18, 20-23, 26-34, and 36 depend from one of claims 1 or 19 and are therefore patentable over the prior art for at least the same reasons as argued for claims 1 or 19.

Withdrawal of the rejections to claims 1-5, 8-23, and 26-36 is requested.

B. Claims 6 and 23 were rejected as unpatentable over Barber in view of Rozen, in view of Riley, United States Patent Publication 2002/0077940.

The rejection of claims 6, 7, 24, and 25 is traversed. Claims 6 and 23 depend directly or indirectly from one of claims 1 or 19 and are therefore patentable over the prior art for at least the same reasons of claims 1 or 19.

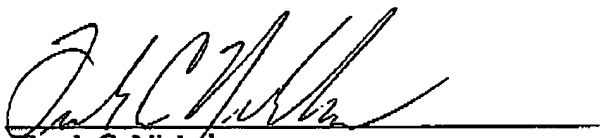
Withdrawal of the rejections to claims 6 and 23 is requested

CONCLUSION

The Applicants respectfully submit that claims 1-36 fully satisfy the requirements of 35 U.S.C. §§103. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested.

Dated: July 5, 2006

Respectfully submitted,
RABINDRANATH DUTTA, *et al.*



Frank C. Nicholas
Registration No. 33,983
Attorney for Applicants

CARDINAL LAW GROUP
Suite 2000
1603 Orrington Avenue
Evanston, Illinois 60201
Phone: (847) 905-7111
Fax: (847) 905-7113